



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Adopt
Biomethane Standards and Requirements,
Pipeline Open Access Rules, and Related
Enforcement Provisions.

Rulemaking 13-02-008
(Filed February 13, 2013)

**REPLY COMMENTS OF THE CALIFORNIA HYDROGEN BUSINESS COUNCIL INC.
ON ASSIGNED COMMISSIONER'S RULING SEEKING COMMENT ON
STAFF PROPOSAL ON RENEWABLE METHANE DEFINITION, JOINT
UTILITY INTERCONNECTION TARIFF, AND CALIFORNIA COUNCIL ON
SCIENCE AND TECHNOLOGY *UPDATED STATE OF SCIENCE REGARDING
MAXIMUM PERMISSIBLE SILOXANE CONCENTRATION***

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December 21, 2018

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I. Introduction

The California Hydrogen Business Council (CHBC) appreciates the opportunity to provide reply comments on the Assigned Commissioner’s Ruling filed on November 19, 2018. The CHBC is comprised of over 100 companies and agencies involved in the business of hydrogen. Our mission is to advance the commercialization of hydrogen in the energy sector, including transportation, goods movement, and stationary power systems to reduce emissions and dependence on oil.¹

¹ The views expressed in these comments are those of the CHBC, and do not necessarily reflect the views of all of the individual CHBC member companies. Members of the CHBC include Advanced Emission Control Solutions, Air Liquide Advanced Technologies U.S., Airthium, Alameda-Contra Costa Transit District (AC Transit), American Honda Motor Company, Anaerobe Systems, Arriba Energy, Ballard Power Systems, Bay Area Air Quality Management District, Beijing SinoHytec, Black & Veatch, BMW of North America, California Performance Engineering, Cambridge LCF Group, Center for Transportation and the Environment (CTE), CNG Cylinders International, Community Environmental Services, CP Industries, Dash2energy, Eco Energy International, ElDorado National – California, Energy Independence Now (EIN), EPC - Engineering, Procurement & Construction, Ergostech Renewal Energy Solution, EWII Fuel Cells, First Element Fuel, FuelCell Energy, GenCell, General Motors, Geoffrey Budd G&SB Consulting Ltd, Giner ELX, Gladstein, Neandross & Associates, Greenlight Innovation, GTA, H2B2, H2Safe, H2SG Energy Pte, H2Tech Systems, Hitachi Zosen Inova ETOGAS GmbH, HODPros, Hydrogenics, Hydrogenious Technologies, Hydrogen Law, HydrogenXT, HyET - Hydrogen Efficiency Technologies, Hyundai Motor Company, ITM Power, Ivys, Johnson Matthey Fuel Cells, Kontak, KORE Infrastructure, Life Cycle Associates, Linde North America, Longitude 122 West, Loop Energy, Luxfer/GTM Technologies, McPhy Energy, Millennium Reign Energy, Montreux Energy, National Renewable Energy Laboratory (NREL), Natural Gas Fueling Solutions – NGFS, Natural Hydrogen Energy, Nel Hydrogen, New Flyer of America, Next Hydrogen, Noyes Law Corporation, Nuvera Fuel Cells, Pacific Gas and Electric Company - PG&E, PDC Machines, Planet Hydrogen, Plug Power, Port of Long Beach, PowerHouse Energy, Powertech Labs, Primidea Building Solutions, Proton OnSite, RG Associates, Rio Hondo College, Rix Industries, Sacramento Municipal Utility District (SMUD), SAFCell, Schatz Energy Research Center (SERC), Sheldon Research and Consulting, Solar Wind Storage, South Coast Air Quality Management District, Southern California Gas Company, Sumitomo Corporation of Americas, Sunline Transit Agency, T2M Global, Tatsuno North America, The Leighty Foundation, TLM Petro Labor Force, Toyota Motor Sales,

II. There is general agreement among parties that the definition of Renewable Methane should be broadened to include a wide range of pathways, as long as they don't result in a net increase in CO2 emissions over their lifecycle.

The vast majority of parties agreed with the proposed staff definition with the caveat that it should be broadened. We agree with the view of many parties that 1) the definition of Renewable Methane ought to include, including not only those in the staff proposal but also biomethane as a subset; 2) eligible carbon sources should be expanded beyond biogenic and atmospheric CO2 to any source that does not use fossil fuels and does not result in a net increase of carbon dioxide emissions; and 3) that electricity feedstock to create renewable hydrogen should be broadened to include not only that which is RPS eligible, as long as it is zero carbon, such as large hydropower and curtailed renewable generation.

While we agree with the general principle advocated for by PG&E that definitions must be carefully considered, we disagree that this should be delayed until another time. We believe our position is substantiated by the fact that the overwhelming majority of comments support defining Renewable Methane as proposed by staff with the aforementioned inclusions.

III. No parties were opposed to all forms of Renewable Methane being treated the same as biomethane when it comes to interconnection, injection, and incentives.

We note that no parties disagreed with the CHBC and Aquahydrex that Renewable Methane derived from renewable hydrogen (or other non-fossil, zero carbon pathways) ought to be given the same interconnection standards, injection protocols, and incentives as biomethane. We, therefore, urge the CPUC to adopt this position.

True Zero, United Hydrogen Group, US Hybrid, Verde, Vinjamuri Innovations, Volute, WireTough Cylinders, Zero Carbon Energy Solutions.

IV. Conclusion

The CHBC thanks the Commission for their consideration and continues to look forward to working together to support deployment of a broad range of renewable gases in California, including renewable hydrogen and its derivatives.

Respectfully submitted,

Dated: December 21, 2018

A handwritten signature in blue ink, appearing to read "Emanuel Wagner", with a long horizontal flourish extending to the right.

Emanuel Wagner
Deputy Director
California Hydrogen Business Council